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November 27, 2020

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BY ECF

The Honorable Gregory H. Woods
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 2260
New York, NY 10007

Re: Linda Hirshman v. Don Franzen
Civil Action No. 1:20-cv-06322 (GHW)

Dear Judge Woods:

Our firm represents Plaintiff Linda Hirshman in the above-referenced matter. This letter is a joint request from counsel for both parties in this matter to further extend the deadlines in connection with Defendant's Motion to Compel Arbitration and Stay This Matter, which Defendant filed on October 9, 2020. (ECF Doc. Nos. 16-18.) The reason for the current request is that it is taking the parties more time than anticipated to finalize a settlement agreement resolving their disputes. This is the second request for an extension of time, and all parties consent to this request.

The original due date for Plaintiff to file her opposition to this motion was October 30, 2020 and the original due date for Defendant's reply was November 6, 2020. Both of those dates were extended to November 27 and December 4, 2020 respectively. Counsel for both parties request that the current deadlines be further extended to December 18, 2020 for Plaintiff's opposition, and January 8, 2021 for Defendant's reply.



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We thank the Court for its consideration.

Respectfully,

A handwritten signature in black ink, appearing to read 'G. Levinson'.

Gabriel Levinson

cc: David I. Greenberger, Esq. (by ECF)

Darnell S. Stanislaus, Esq.